

Compliance with SB 14

The Hazardous Waste Source Reduction and Management Review Act of 1989 (SB 14)

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Source Reduction and Environmental Planning
Unit



Today's Agenda

- Goals of SB 14
- Are you subject to SB 14?
- The Plan
- The Performance Report
- The Summary Progress Report

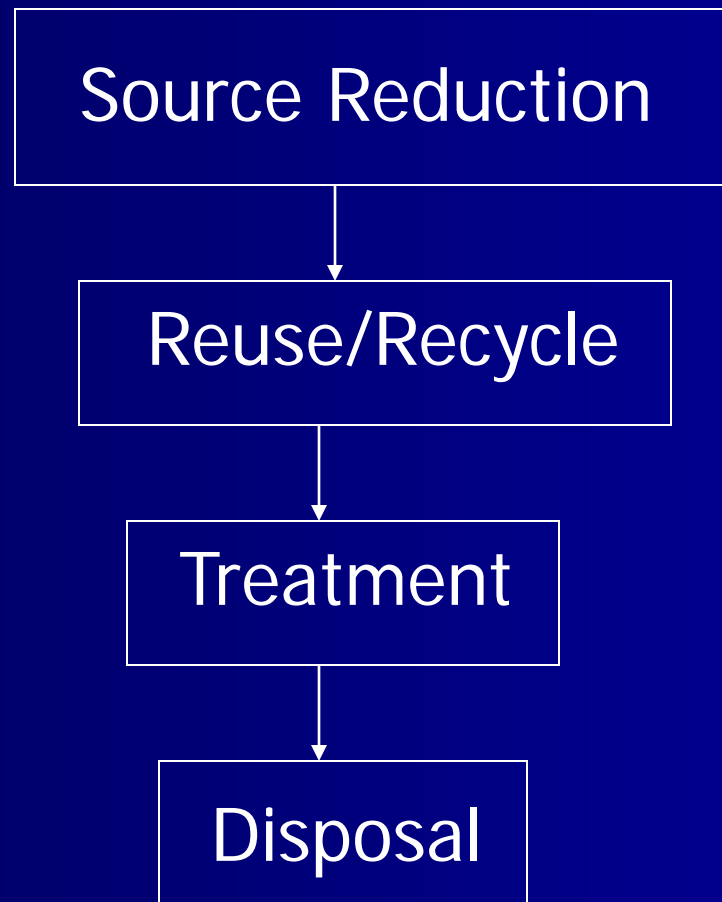
Goals of SB 14:

- Reduce the generation of hazardous waste at its source,
- Reduce the release to the environment of chemicals that have adverse and serious health or environmental effects, and
- Document hazardous waste information and make it available.

What is source reduction?

- Source Reduction = Pollution Prevention
The act of preventing waste at its source...before generation.
- Source reduction is not:
 - Recycling
 - Treatment
 - Transfer to another environmental medium
 - Concentration or dilution

Waste Management Hierarchy



Source reduction and SB 14

- SB 14 requires generators to look at their waste-generating processes and identify source reduction opportunities.
- It encourages businesses to look for ways to make continual improvements
- Successful source reduction = cost savings
- Good for business
- Good for the environment

Generator Requirements

- All generators subject to SB 14 in 2010 must prepare a Plan, Performance Report and SPR by **September 1, 2011.**
- Plan and Performance Report must be kept on site and made available upon request by an agency or the public.
- Only the SPR must be submitted to DTSC by September 1, 2011.
- DTSC may ask a generator to submit their SB 14 documents.

Compliance with SB 14 means:

1. Completion of a Source Reduction Evaluation Review and Plan (Plan)
2. Completion of a Hazardous Waste Management Performance Report (Performance Report)
3. Completion and submittal of a Summary Progress Report (SPR)

Alternative reporting options for small businesses

Confidentiality

- Generator may claim some information as trade secret or confidential.
- Generator must mark "confidential" on each page containing confidential information.
- Agency inspectors can review this info.
- When agency requests SB 14 document containing confidential information, generator must submit two versions of document:
 - One containing confidential information properly marked.
 - The other without the confidential information that indicates which pages have been removed.

Resources

- DTSC's 2010 SB 14 Guidance Documents and other publications
<http://www.dtsc.ca.gov/PollutionPrevention/SB14/SB14.cfm>
- Technical support:
(916) 322-3670
– E-mail: sb14@dtsc.ca.gov

More Resources

- DTSC Regional P2 Contacts
 - Nabil Yacoub (714) 484-5389
 - Natalie Marcanio (916) 324-2659
 - Matt McCarron (510) 540-3828
- P2 Resource Exchange – Topic Hubs
www.p2rx.org
- Western P2 Network-Topic Hubs
www.westp2net.org

More Resources

- DTSC Regulatory Assistant Officers
 - Mary Misemer (714) 255-3617 (North Cal)
 - Andre Amy (818) 717-6581 (Chatsworth)
 - Gloria Conti (714) 484-5400 (Cypress)
- DTSC manifest, EPA id #s questions
 - Call 1-800-618-6942

Course Materials

- SB 14 Guidance Manual (Doc. No. 001)
 - Also contains Summary Progress Report
 - and OPPGT Publication List – Appendix E
- Compliance Checklist (Doc. No. 004)
- Available upon request:
 - Hazardous Waste Minimization Checklist & Assessment Manuals for various industry sectors – see publication list – Appendix E

Are you subject to SB 14?



SB 14 is a Site-Specific Requirement

- "Site" means the location of an operation that generates hazardous waste.
- If two operations are contiguous and owned by the same person (i.e., generator) the operations are considered one "site."
- If two locations owned by the same person are not touching, they are two sites.

See Section 25205.1(h) of the California Health and Safety Code for definition of "site."

SB 14 Applicability Thresholds

- SB 14 applies to generators who *routinely generate* >12,000 kg haz waste or >12 kg extremely hazardous waste during a *reporting year (2010)*

12,000 kg = 26,400 lbs

= 13.2 tons

= 3,165 gallons

12 kg = 26.4 lbs = 3.2 gallons

See Chapter 2 of your Guidance Manual

Reporting Year = 2010

- SB 14 requires reporting on a 4-year cycle
- Hazardous waste generation data from **calendar year 2010** (the reporting year) is used to determine SB14 applicability.
- Use reporting year data as the basis for the source reduction evaluation.
- Data from the reporting year is the basis for your SB 14 documents due on or before September 1, 2011

Determine applicability for Reporting Year 2010

- Conduct inventory of RCRA and non-RCRA wastes stored on site
 - Review hazardous waste manifest records
 - Review shipping records and weight tickets
 - Inspect storage areas
- List all hazardous wastes generated in 2010 including CWC and total weight or volume
 - Include any liquid or solid hazardous wastes that are treated on site
 - Include wastes that are recycled, treated or disposed off site

Quantify all wastes prior to treatment or recycling

Example

Hazardous Waste	CWC	Amount Generated - 2010
Rinse water	132	85,600 gallons
Plating bath	792	1,000 gallons
Filter cake	171	890 pounds
Paint waste	331	10,000 pounds
Solvent	214	1,500 pounds
Waste oil	221	500 pounds
Drums/containers	513	5,400 pounds
Asbestos waste	151	200 pounds
Contaminated Rags	551	500 pounds

SB 14 applies only to **routinely generated waste streams**

- From ongoing processes and operations
- From regularly scheduled maintenance
- Includes hazardous wastes treated on site AND hazardous wastes recycled, treated or disposed off site.
- Focus on point of generation.

Cross non-routine wastes off your list.

SB-14 does not apply to exempted waste streams

- motor vehicle fluids
- household haz waste
- asbestos
- PCBs
- emergency response
- lab-scale research waste
- lead acid batteries
- site clean up
- medical waste
- spent ordinance
- demolition waste
- Universal waste

Complete list GM pg. 19 and 22 CCR 67100.2

***Cross exempted waste streams off your
list***

SB 14 does not apply to **Universal Waste**

- Universal wastes must be managed according to universal waste regulations – 22 CCR 66273
- Universal wastes include:
 - Batteries
 - Thermostats (mercury-containing)
 - Electric Lamps (fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps)
 - Cathode ray tubes (TV screens and monitors)

Don't double count

- If you treat hazardous waste on site, then discharge this waste to the sewer, do not include treatment residuals (secondary wastes) on your list.
- Only count treatment residuals if:
 - they are derived from treatment of a nonhazardous waste stream

Excluded recyclable materials

- Some recyclable material are excluded from classification as a waste *provided* the conditions in Health and Safety Code Section 25143.2 are met.
- Such materials would not be included in your SB 14 total.
- Questions: Contact DTSC's Waste Classification Unit (916) 327-4499

Are you subject to SB 14?

- Exclude nonroutine, exempt, and secondary (residuals) wastes
- Convert remaining waste streams to common units (lbs, Kg, tons)
- Add remaining waste streams and compare total to SB14 threshold
 - 12,000 kg=26,400 lbs= 13.2 tons
- Subject to SB 14 if waste generated in 2010 exceeds the threshold.

Extremely Hazardous Wastes

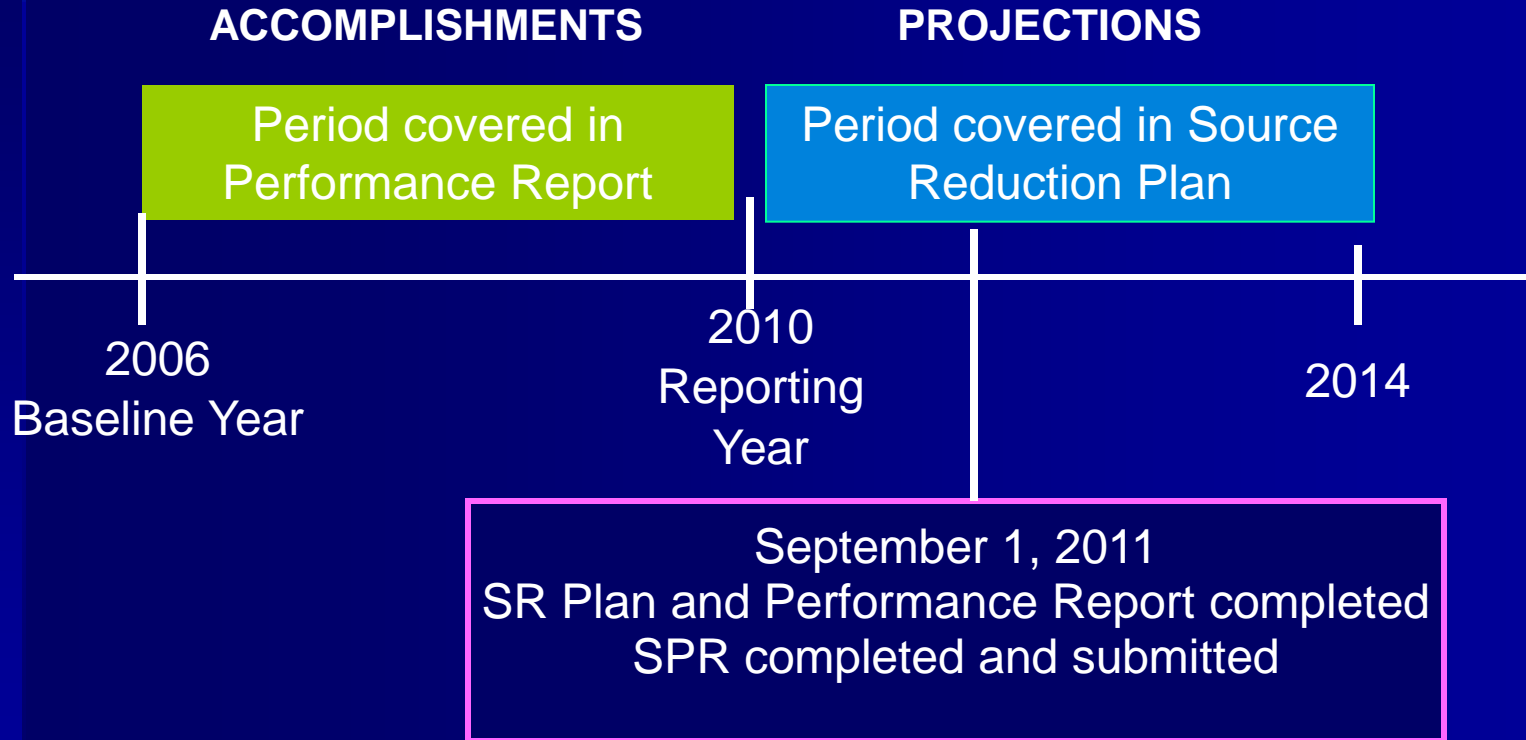
- If you generate extremely hazardous wastes, prepare a separate list and compare the total to the 26.4 lb threshold.
- Defined in California Health & Safety Code Section 25115
- Also see California Code of Regulations, Title 22 Sections 66261.107 - .113

Compliance with SB 14 means...

1. Conduct source reduction evaluation
2. Complete a Source Reduction Evaluation Review and Plan (Plan)
 - Checklist alternative for small businesses
3. Complete a Hazardous Waste Management Performance Report (Performance Report)
 - USEPA biennial gen report for small businesses
4. Complete and submit a Summary Progress Report (SPR)

2011 SB 14 Reporting Timeframes

Period covered in Summary Progress Report (SPR)



What next?

- Subject to SB 14?
 - Initiate source reduction evaluation
- Not subject to SB 14?
 - Could still benefit from source reduction
 - Cost savings due to improved efficiency and decreased hazardous waste disposal
 - Improve worker health and safety
 - Improve compliance status
- Continuous improvement is good for business

Other Regulatory Requirements

- Generator certification for program in place (T22,CCR,66262.27
- Large quantity RCRA generators- Biennial Report certification[T22, CCR, 6262.41(a)]
- Consolidated manifest users -Certification [HSC 25160.2(b)(4)(H)]

Other Regulatory Requirements

- Onsite treatment under Conditional authorization (CA)- Certification [HSC 25200.3(c)(2) &25202.9]
- Onsite treatment under Permit by Rule (PBR)-Certification [T22, CCR, 66262.45(c)]
- Transportable Treatment Units (TTUs) under PBR - Certification [T22, CCR 66262.45(a)]

Other Regulatory Requirements

- Standardized Permit – Certification [T22, CCR, 67800,1(a)(1) & 66264.73]
- Onsite/Off-site Full Permit (TSDF) - Certification[T22, CCR, 66264.73]

What if you are out of compliance?

- May issue a notice of noncompliance
- Generator must correct deficiencies and submit revised documents within 60 days of notice
- CUPA/DTSC may impose civil penalties up to \$1000/day for failure to submit within the required period
- Let DTSC's Source Reduction Unit help you return to compliance

Questions?



Call or e-mail OPPGT,
SB14 Unit

- (916) 322-3670

- sb14@dtsc.ca.gov